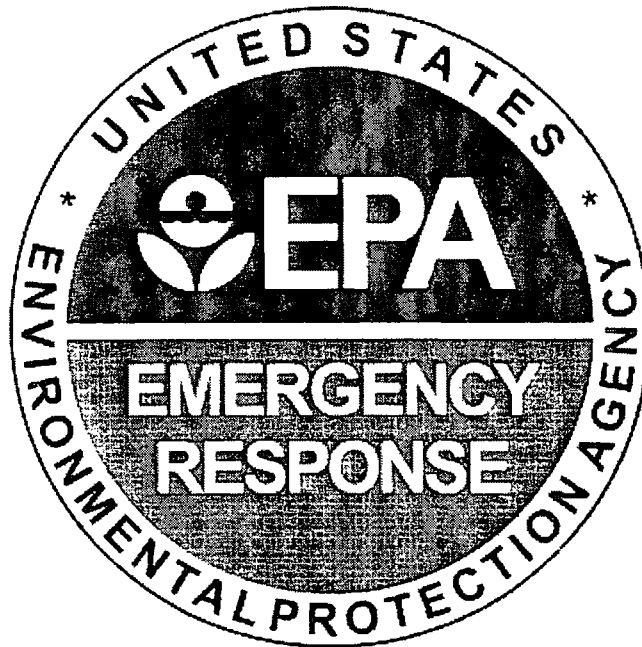


U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
ESI-PRP Removal - Removal Polrep

EPA Region 5 Records Ctr.



393805



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #1
POLREP #1 - Initial POLREP for PRP Group Removal
ESI-PRP Removal
B5YS
Indianapolis, IN
Latitude: 39.9128600 Longitude: -86.2423680

To: Sue Michael, City of Indianapolis
Tom White, City of Indianapolis
Richard Wise, City of Indianapolis
Harry Atkinson, IDEM
Ryan Groves, IDEM
Megan Nagle, IDEM
George Richotte, IDEM
Jason Doerflein, Marion County Health Department
Stephen Jones, Pike Fire Department
Linda Nachowicz, U.S. EPA Region V, ERB 2
Charles Gebien, U.S. EPA Region V
John Maritote, U.S. EPA Region V
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Mark Johnson, ATSDR
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Stan Rigney, IDEM
Randy Braun, IDEM
USCG NRC, NRC
David Chung, OERR
Jeff Kelley, U.S. EPA
Maupin Natalie, IDEM

From: Verneta Simon & Anita L. Boseman, On-Scene Coordinators

Date: 4/22/2011

Reporting Period: 4/6/2011 - 4/22/2011

1. Introduction

1.1 Background

Site Number:	B5YS	Contract Number:	
D.O. Number:		Action Memo Date:	9/30/2010
Response Authority:	CERCLA	Response Type:	PRP Oversight
Response Lead:	PRP	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:	4/6/2011	Start Date:	4/6/2011
Demob Date:		Completion Date:	
CERCLIS ID:	INN0051050501	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

Bankrupt Commercial Used Oils Facility

1.1.2 Site Description

The ESI site was a commercial used oil processing facility that included a tank farm and several ancillary buildings such as a wastewater treatment plant, a sludge treatment building, a sludge treatment process area, an oil dehydration process area, laboratory/office building, and a

truck off-loading building. In addition, the ESI facility has a parking lot in front of the tank farm, a maintenance building immediately adjacent to the tank farm, and a rail unloading area less than one mile west of the tank farm. The parking lot, maintenance building, and rail unloading area were leased from Marathon Petroleum.

The tank farm and ancillary buildings cover approximately 8.2 acres and have multiple process and storage tanks, ranging in size from 1,200 to 1,000,000 gallons in volume. The tank farm was designed so that all stormwater would be captured in its internal sewer system and ultimately run through the wastewater processing equipment prior to being discharged into the City of Indianapolis Sanitary Sewer System.

1.1.2.1 Location

4910 West 86th Street, Indianapolis, Indiana 46268

1.1.2.2 Description of Threat

There are a number of chemicals stored at the facility, for example, recycled oils, caustic soda, hydrogen peroxide, and sulfuric acid in tanks and totes. In addition, there are 1.5 million gallons of sludge stored on-site in two separate one million gallon bunker tanks. Furthermore, all the storm water drains into the bunker tanks with the 1.5 million gallons of sludge, therefore, there is a strong potential for an overflow during high intensity rainfall events.

From 2007 to the present, there have been City of Indianapolis sanitary sewer overflows that were traced to this facility. Contaminants were found as far as 6 miles from this facility at 27 residences and three golf courses: Riverside Golf Academy, Riverside Golf Course, and Coffin Golf course. The Indianapolis Department of Public Works has spent about \$100,000 dealing with the sewer overflows. In one home, it was necessary to replace the hot water tank and the sump pump because of the overflow backing up into their basement.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

On July 18, 2007, ESI was informed by a customer that they had discovered 28 mg/kg PCBs in a used oil shipment from ESI. This resulted in some PCB remediation, however, there is one tank, Tank #51, and maybe two additional tanks, Tank #43 and #44 that were PCB impacted. On September 30, 2010 Tank #51 received a TSCA approval letter on a remediation process to be followed by WSP, ESI's Insurance Company's Environmental Consultant.

A limited site assessment was conducted on September 1, 2010. Also, on September 1, there was a joint IDEM and USEPA Land and Chemicals PCB inspection.

Prior to USEPA mobilizing to the site, the City of Indianapolis Department of Public Works and United Water checked on ESI and provided a chemical inventory. On October 7, IDEM responded to the security guard's observation of a ESI tanker leaking and placed boom until USEPA arrived on October 8.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

2.1.2 Response Actions to Date

- On April 6, 2011, U.S. EPA met with personnel from Safety-Kleen (Project Coordinator) and TriHydro (Contractor), both from the PRP Group. The PRP Group personnel began waste characterization sampling and waste volume assessment activities.
- On April 7, 2011, OSC Boseman, PRP Group personnel, and the City of Indianapolis personnel met at the site for a transitional site meeting.
- On April 8, 2011, OSC Boseman and TriHydro were on site. TriHydro continued site characterization in preparation for removal activities. U.S. EPA will oversee the PRP Group's removal activities.
- On April 8, 2011, U.S. EPA agreed to continue the discharge events as outlined in the modified SDA until the City of Indianapolis has issued a SDA to the PRP Group. TriHydro loaded and hauled off 5,000 gallons of oily water from the northeast area storm sewer. The water was disposed of at Clean Water Limited's Cherokee Drive facility in Dayton, Ohio. The PRP Group has contracted site security, and utilities will be transferred to PRP Group on April 11, 2011.
- On April 11, 2011, START member Jay Rauh mobilized to the Site to begin oversight of the PRP removal activities. Tim Gunn of TriHydro is the on-site PRP Group representative. Mr. Gunn requested that US EPA discharge water from the southwest area storm sewer since the PRP group had not received their SDA from the City of Indianapolis.

TriHydro loaded and hauled off 24,000 gallons of oily water from the northeast area storm sewer. The water was disposed of at Clean Water Limited's Cherokee Drive facility in Dayton, Ohio. The water level in the northeast area storm sewer dropped by 1.5 feet after removing 24,000 gallons of oily water from it.

US EPA OSC Verneta Simon, US EPA Community Involvement Coordinator (CIC) Janet Pope, PRP Group Project Coordinator Steve Fleming, TriHydro Project Manager Gary Risse, Pike Township Fire Department (PTFD) Fire Marshal Stephen Jones, and the City of Indianapolis participated in a community meeting held at 1200 Madison, Indianapolis, Indiana.

- On April 12, 2011, Rauh, Gunn, and Risse were present at the Site.

Stephen Jones, PTFD Fire Marshal, was on site to relay his concerns about fire hazards and building occupancy. Since the fire suppression systems were inoperable in the unloading building and solid storage building, he requested that all materials be removed from those buildings. He also requested that all vehicles park further than 20 feet from either building to prevent any potential fire from spreading from one source to the other. Since the unloading building has usable offices attached, he would allow those offices to be occupied if those conditions were met. He will return to the Site to decide if the materials have been removed to his satisfaction before major work begins.

Sam Coffman and Michael Gordon of Commercial Sewer Cleaning (CSC) were on site

to attempt videotaping portions of the northeast storm sewer system. They were not able to use their camera due to water and sludge buildup in the sewer.

Richie Byrd of Environmental Restoration, a US EPA ERRS contractor, was on site to discharge storm water from the southwest area to the City of Indianapolis sanitary sewer system under the US EPA SDA. 33,132 gallons of water was discharged. A total of 584,118.8 gallons of the allotted 1 million gallons in the modified SDA issued on February 15, 2011 has been discharged to the City of Indianapolis sanitary sewer system. Late in the day, Stephen Fleming received his SDA. A copy of the PRP Group's SDA is contained in the section called "Documents". Mr. Byrd also trained both START and TriHydro on how to use the computer in the Control Building, in the event it was necessary to pump the primary separator, since ESI did not leave an operations manual.

Gunn collected water sample SWArea-SS17,041211 from the effluent of the southwest area discharge system. The sampling results will be submitted to the City of Indianapolis for consideration of a discharge permit for the PRP Group. Gunn also collected water sample NEArea-SSVault,041211 from the northeast area storm sewer system. The sampling results will be used to explore alternate disposal options for the oily water.

TriHydro loaded and hauled off 19,400 gallons of oily water from the northeast area storm sewer. The water was disposed of at Clean Water Limited's Cherokee Drive facility in Dayton, Ohio.

- On April, 13, 2011, TriHydro subcontractor, EQIS, began removing materials from the unloading building. All oily waste was placed in a roll-off box to be disposed of as Subtitle D oily waste, and the other material was placed in a standard roll-off box to be landfilled.
- On April, 14, 2011, TriHydro subcontractor, EQIS, continued removing materials from the unloading building. All oily waste was placed in a roll-off box to be disposed of as Subtitle D oily waste, and the other material was placed in a standard roll-off box to be landfilled. EQIS also collected unusable oily hoses and placed them in the Subtitle D roll-off box.

Tom White and Mark Richards of the City of Indianapolis Water Department were on site to collect a water sample from the Tank 51 containment area. Sample ESI-51-041411 was collected from the northeast corner of the Tank 51 containment. The sampling results will be used for consideration of a discharge permit to the City of Indianapolis storm sewer system.

TriHydro loaded and hauled off 5,000 gallons of oily water from the oil/water separator west of the unloading building. After pumping 5,000 gallons of water from the oil/water separator, the water level in the oil/water separator dropped by 0.73 feet. The water was disposed of at Clean Water Limited's Cherokee Drive facility in Dayton, Ohio.

- On April 15, 2011, TriHydro subcontracted an electrician to identify any potential electrical hazards at the Site. TriHydro loaded and hauled off 15,000 gallons of oily water from the northeast area storm sewer. The water was disposed of at Clean Water Limited's Cherokee Drive facility in Dayton, Ohio.
- On April 18, 2011, OSC Simon, Ken Gollon of TriHydro, and Rauh were on site. Gollon spent time

working on a website that could disseminate information about removal activities at the Site to US EPA and the public. The information, presented in a daily log format, includes personnel on site, amount of materials loaded and hauled off, and any other pertinent information

- On April 19, 2011, Gunn, Gollon, and Rauh were on site. 1.5" of rain fell during a heavy thunderstorm in the morning. To prevent the oil/water separator from overflowing, TriHydro moved 5,000 gallons of oily water from the oil/water separator to the west million gallon tank, using the computer inside the Control Building. The liquid level in the oil/water separator dropped by 1 foot after the 5,000 gallons were moved. No stormwater was noticed escaping the Site. TriHydro loaded and hauled off 30,000 gallons of oily water from the northeast area storm sewer. The water was disposed of at Clean Water Limited's Cherokee Drive facility in Dayton, Ohio. The water in the northeast area storm sewers was notably rising during the heavy rains.

Carol Stanias of US EPA Water and Megan Nagle of IDEM Water were on site for a site walk.

- On April 20, 2011, Gunn, Gollon, and Rauh were on site. 1" of rain fell during the overnight hours, and elevated water levels were noted in the northeast part of the Site. Water backed up in the northeast area storm sewer had entered into and equalized with the Off Spec Oil Containment (East Containment). The liquid level in the oil/water separator had also risen. TriHydro loaded and hauled off 40,000 gallons of oily water from the northeast area storm sewer. The water was disposed of at Clean Water Limited's Cherokee Drive facility in Dayton, Ohio.

OSC Simon and Carol Stanias of US EPA Water were on site for a site walk.

- On April 21, 2011, Rauh, Gunn, and Gollon were on site.

Heritage Environmental was on site with a vac truck to determine whether the sludge in the million gallon tanks was pumpable.

A conference call regarding plans to seal the million gallon tanks from the stormsewer system took place with OSC Simon, Weston START members Rick Mehl, Jay Rauh, and Brian Coninx, and PRP Group representatives Steve Fleming (Safety Kleen), Gary Risse (TriHydro), and Tim Gunn (TriHydro). The PRP Group proposed using cement to make the seal. Weston START Rick Mehl suggested alternately using expanding cellular concrete as a non-permanent solution. OSC Simon discussed using a bladder pig. The PRP Group agreed to take the suggestions under consideration. In another conference call with the same parties later in the day, OSC Simon gave approval to use the cement method after the PRP Group reported difficulty finding a local supplier for the cellular concrete. The PRP Group will begin sealing the million gallon tanks at 0800 EST on April 22, 2011.

TriHydro loaded and hauled off a total of 42,080 gallons of storm water from the northeast area storm sewer and East Containment. The water was taken to Clean Water Limited's Cherokee Road facility in Dayton, OH for disposal.

- On April 22, 2011, Rauh, Gunn, and Gollon were on site along with their various cement and other subcontractors

TriHydro constructed a temporary containment on the curbing just south of the East Containment with sand bags and poly sheeting.

The cement work took place at the vault structure of the million gallon tanks. There were 4 total "pours," two into each million gallon tank vault. As the initial pour took place, aeration was obvious in the back of the vaults. The second pours did not cause aeration which was viewed as a positive sign. The volume estimates appeared to be good, and TriHydro and their subcontractors reported that everything went as planned. The seal will be tested further next week, but initial indications are that the million gallon tanks are now separate from the stormsewer system.

TriHydro mobilized two frac tanks with 42,0000 gallons of capacity

TriHydro used left over cement to patch a curb in the southwest area which appeared to be a potential low point. They also made ramps on the south berm so that the frac tanks could be moved into the northeast area

TriHydro loaded and hauled off 29,000 gallons of water from the northeast area stormsewer and East Containment.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

On April 7, 2011, the Administrative Settlement Agreement on Consent (ASAOC) was executed. A copy of the ASAOC is available on this website under "Documents". On April 12, 2011, the City of Indianapolis issued a SDA to the PRP group.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>
Oily water	liquid	189,480 gallons			X

2.2 Planning Section

2.2.1 Anticipated Activities

- Hydraulically disconnect the million gallon bunker tanks from the storm sewer system
- Clean storm sewer system
- Remove wastes

2.2.1.1 Planned Response Activities

None

2.2.1.2 Next Steps

US EPA will provide oversight of PRP Group removal activities

2.2.2 Issues

A Backflow Preventer Inspection took place on April 6, 2011. Four of the nine backflow preventers were unable to be tested. Details will be outlined in the Backflow Preventer Inspection Report. An extension will be requested to address these four backflow preventers and the associated waterline.

Wet weather is anticipated the next couple days.

2.3 Logistics Section

2.4 Finance Section

2.4.1 Narrative

2.5 Safety Officer

2.6 Liaison Officer

2.7 Information Officer

2.7.1 Public Information Officer

2.7.2 Community Involvement Coordinator

The next community meeting will be held on June 6, 2011 at 2 pm.

3. Participating Entities

3.1 Unified Command

Indiana Department of Environmental Management
Indianapolis Department of Public Works
Pike Township Fire Department
City of Indianapolis

3.2 Cooperating and Assisting Agencies

Marion County Health Department

4. Personnel On Site

5. Definition of Terms

ERRS – Emergency and Rapid Response Services
IDEM – Indiana Department of Environmental Management
OSC – On-Scene Coordinator
RCRA – Resource Conservation and Recovery Act
START – Superfund Technical Assessment and Response Team
U S EPA – United States Environmental Protection Agency
POLREP – Pollution Report
ASAOC - Administrative Settlement Agreement on Consent
PRP - Potentially Responsible Party

6. Additional sources of information

6.1 Internet location of additional information/reports

For additional information, please refer to the US EPA lead removal action website at www.epaosc.org/esl

6.2 Reporting Schedule

7. Situational Reference Materials